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*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND CALIFORNIA STATE AGENCIES  
EXTENDING TIME TO RESPOND TO  
APPLICATION OF DELOITTE &  
TOUCHE LLP**

Re: Dkt. No. 2197

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and California Department  
4 of Toxic Substances Control, California Department of Water Resources acting by and through  
5 the California Energy Resources Scheduling Division and on behalf of the State Water Project,  
6 State Water Resources Control Board, Regional Water Quality Control Boards, State Energy  
7 Resources Conservation and Development Commission, California Department of Forestry and  
8 Fire Protection (CAL FIRE), California Coastal Commission, California Air Resources Board,  
9 Department of Parks and Recreation, San Francisco Bay Conservation and Development  
10 Commission, Department of Housing and Community Development, Central Valley Flood  
11 Protection Board, High Speed Rail Authority and California Department of Fish and Wildlife  
12 (collectively, the “**California State Agencies**”), on the other hand. The Debtors and the  
13 California State Agencies are referred to in this Stipulation and Agreement for Order collectively  
14 as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

15 **RECITALS**

16 A. On May 22, 2019, the Debtors filed the *Application Pursuant to 11 U.S.C. §§ 327*  
17 *and 328 for an Order Authorizing Employment and Retention of Deloitte & Touche LLP as*  
18 *Independent Auditor and Advisor to the Debtors Nunc Pro Tunc to the Petition Date* [Dkt.  
19 No. 2197] (the “**Application**”), which is set for a hearing before the Court at 9:30 a.m. on  
20 June 12, 2019. Any response or opposition to the Application is due by 4:00 p.m. (Pacific Time)  
21 on June 5, 2019.

22 B. Counsel for the California State Agencies has requested, and counsel for the  
23 Debtors has agreed, that the time for the California State Agencies to respond to the Application  
24 be extended.

1 NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE  
2 INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS  
3 STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE  
4 UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,  
5 THAT:

6 1. The time for the California State Agencies to file and serve any response or  
7 opposition to the Application is extended through 4:00 p.m. (Pacific Time) on June 7, 2019.  
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9 [Signatures on next page]  
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1 Dated: June 5, 2019

2 KELLER & BENVENUTTI LLP

3 /s/ Thomas B. Rupp

4 Thomas B. Rupp

5 *Attorneys for Debtors*  
6 *and Debtors in Possession*

7  
8 XAVIER BECERRA  
9 *Attorney General of California*  
10 DANETTE VALDEZ  
11 *Supervising Deputy Attorney General*

12 FELDERSTEIN FITZGERALD  
13 WILLOUGHBY & PASCUZZI LLP

14 /s/ Paul J. Pascuzzi

15 Paul J. Pascuzzi  
16 FELDERSTEIN FITZGERALD  
17 WILLOUGHBY & PASCUZZI LLP

18 *Attorneys for California Department of*  
19 *Toxic Substances Control, California*  
20 *Department of Water Resources acting by*  
21 *and through the California Energy*  
22 *Resources Scheduling Division and on*  
23 *behalf of the State Water Project, State*  
24 *Water Resources Control Board, Regional*  
25 *Water Quality Control Boards, State*  
26 *Energy Resources Conservation and*  
27 *Development Commission, California*  
28 *Department of Forestry and Fire*  
*Protection (CAL FIRE), California Coastal*  
*Commission, California Air Resources*  
*Board, Department of Parks and*  
*Recreation, San Francisco Bay*  
*Conservation and Development*  
*Commission, Department of Housing and*  
*Community Development, Central Valley*  
*Flood Protection Board, High Speed Rail*  
*Authority, and California Department of*  
*Fish and Wildlife*